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Department of Toxic Substances Control

Terry Tamminen
Agency Secretary
Cal/EPA

Edwin F. Lowry, Director
1011 North Grandview Avenue
Glendale, California 91201-2205



Arnold Schwarzenegger
Governor

June 25, 2004

Mr. Thomas Wideman
Exide Technologies, Inc.
2700 S. Indiana Street
Vernon, California 90023

CONDITIONAL APPROVAL OF RCRA FACILITY INVESTIGATION (RFI) WORK PLAN
THE SAMPLING AND ANALYSIS PLAN FOR THE OPEN DRAINAGE CHANNEL AT
EXIDE TECHNOLOGIES, INC. VERNON FACILITY, 2700 S. INDIANA AVENUE,
VERNON, CALIFORNIA ; EPA ID NUMBER CAD 097 854 541

Dear Mr. Wideman:

The Department of Toxic Substances Control (DTSC) has reviewed the Sampling and Analysis Plan (SAP) for the Open Drainage Channel at Exide Technologies, Vernon facility, dated June 21, 2004, that was submitted by Advanced GeoServices Corp. on your behalf. This SAP was submitted in response to DTSC's request, dated May 20, 2004, as part of the RCRA Facility Investigation Work Plan.

DTSC hereby approves this SAP subject to the following conditions:

- Even though lead is of paramount interest, a representative portion of the sediment analyses must include all of the constituents-of-concern (COC), e.g. antimony, arsenic, cadmium, chromium, lead, copper, zinc. Bear in mind that some of these other COCs have been risk drivers in the Health Risk Assessment that Exide prepared for the draft Environmental Impact Report (EIR) with respect to its permit application. The subset of samples that need to be submitted for the complete COC analyses will be determined in the field in conjunction with DTSC. A list of COCs needs to be provided to DTSC, at a minimum, two (2) weeks prior to initiating field work.
- The sampling interval for "on-site" samples should be at 50 feet or less within the concrete lined drainage channel within the property. If no sediment is available at the original proposed location, the sample locations can be moved ± 25 feet to locations where sediment deposition has occurred. However, if no sediment deposition is available, the sample collection using the brush may revert to the proposed 100-foot spacing. The total number of samples collected will depend on the channel conditions

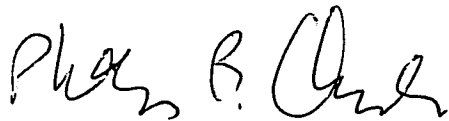
- The sampling interval for "off-site" samples should be at 100 feet or less within the concrete lined drainage channel south of the property. If no sediment is available at the original proposed location, the sample locations can be moved \pm 50 feet to where sediment deposition has occurred.
- While DTSC does not object to the collection of three sediment samples up-channel from Exide, it will not accept these as background without an adequate evaluation of the antecedent wind conditions that demonstrates there was no possibility of influence on the samples from fugitive dust emanating from the Exide Facility.
- Samples that may be required to be analyzed for organic COCs need to be handled differently than those proposed for lead. Sample handling protocols need to be revised to accommodate organic COCs and provided to DTSC, at a minimum, two (2) weeks prior to initiating field work.
- With respect to metals analyses, DTSC recommends that all samples should be analyzed for all metals by US EPA Guidance SW-846, third Edition or more recent publication, Method A6020 by the Inductively Coupled Plasma (ICP)/Mass Spectrometer (MS), especially the sample should be analyzed for antimony, arsenic, cadmium, chromium (total), lead, copper, and zinc.
- With respect to all COC analytes, GNB will provide DTSC a list of the proposed detection and reporting limits, at a minimum, two (2) weeks prior to initiating field work. These limits must be commensurate with the latest U.S. EPA Region IX Preliminary Remediation goals and with various aquatic and faunal standards, goals and Suggested No Adverse Response Levels (SNARLS), etc.
- The site-specific Health and Safety Plan (HASP) must be provided to DTSC, at a minimum, two (2) weeks prior to initiating field work. DTSC will provide comments, if necessary, on the HASP, prior to initiation of field work, that Exide will be expected to incorporate into a final HASP for the field work.
- DTSC requires a minimum of 10 business days notification of field work.
- The RFI Report must contain photographic documentation of each of the sampling locations, written description of the sample locations, sample location maps at an appropriate scale (sampling locations should be precisely located either by survey or GPS), and a description of the accessibility of the sampled locations to humans and fauna.

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Exide is required to begin implementation of the conditionally approved RFI Workplan within sixty (60) calendar days of the date of this letter. An RFI Report is required within ninety (90) calendar days of completion of the field work.

If you have any questions, please feel free to contact me at (818) 551-2921 or Liang Chiang, P.E. at (818) 551-2964.

Sincerely,



Philip B. Chandler, R. Geophys.
Unit Chief
Southern California Permitting and Corrective Action Branch
Hazardous Waste Management Program

cc. Mr. Paul G. Stratman, P.E.
Advanced GeoServices Corp.
1055 Andrew Drive, Suite A
West Chest, Pennsylvania 19380-4293

Mr. Steve Armann
RCRA Facility Management Office, SP-4
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, California 94105

Ms Orchid Kwei
Senior Counsel
Office of Legal Counsel
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

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cc: Ms. Florence Gharibian
BranchChief
Statewide Compliance Division
Hazardous Waste Management Program
Department of Toxic Substances Control
1011 North Grandview Avenue
Glendale, California 91201

Mr. Guenther Moscat
Office of Program Audits and Environmental Analysis
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0845

Mr. Michael Choe, P.E.
Permitting and Program Development Branch
Hazardous Waste Management Program
Department of Toxic Substances Control
1001 I Street, 22th Floor/ P.O. Box 0806,
Sacramento, California 95814-0806

Mr. Andres Cano
Geology, Permitting and Corrective Action Branch
Hazardous Waste Management Program
Department of Toxic Substances Control
5796 Corporate Avenue
Cypress, California 90630